UNITED STATES DISTRICT COURT
District of Minnesota
Criminal No. 16-204 (PJS/SER)

UNITED STATES OF AMERICA,	**SUPERSEDING INDICTMENT**
Plaintiff,	18 U.S.C. § 2252(a)(2) 18 U.S.C. § 2252(a)(4)(B) 18 U.S.C. § 2252(b)(1) 18 U.S.C. § 2252(b)(2) 18 U.S.C. § 2253(a)
v.	
1. JESSE DUANE JACOBS,	
Defendant.	

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

On or about August 12, 2015, in the State and District of Minnesota, the defendant, **JESSE DUANE JACOBS,** knowingly possessed hundreds of image and video files depicting minors engaging in sexually explicit conduct, of which approximately 400 depict previously-identified children. **JESSE DUANE JACOBS** obtained most of these image and video files from the Internet, mainly through peer-to-peer file-sharing programs. **JESSE DUANE JACOBS** maintained the image and video files on several digital storage devices, including a computer hard drive.

COUNT 1
(Distribution of Child Pornography)

On or about February 7, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly distribute a visual depiction using a means

SCANNED
JAN 09 2017
U.S. DISTRICT COURT ST. PAUL

and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit: a computer video file titled "Webcam - 2011 Surfgirl 11Yo Many Poses & Nude.avi," which is approximately 22 minutes long and depicts two girls in early pubescence lying on a bed with their legs spread apart exposing their genitals, and masturbating, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 2
(Distribution of Child Pornography)

On or about December 14, 2014, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly distribute a visual depiction using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit: a computer video file titled "!Bob! Webcam Stickam - 2010 Racquel2Fred S 11Yo Video.flv," which is approximately 4 minutes long and depicts a prepubescent girl removing all of her clothing in front of the camera, spreading her legs, and using a marker and her fingers to penetrate her vulva, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 3
(Receipt of Child Pornography)

On or about August 4, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce and that had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit, a computer image file titled "Lc-639.jpg," which depicts a prepubescent girl lying on her back, spreading her legs while being penetrated vaginally by an adult male, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 4
(Receipt of Child Pornography)

On or about August 10, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce and that had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit, a computer image file titled "Imgsrc Ru Pthc Pedo Babyshivid Childlover Private Daughter Torpedo Ranchi Lolita - Blk.jpg," which is depicts a naked adult male with an erection lying on a bed with two naked prepubescent girls, one of whom is lying on her back with her legs spread apart, on the adult male's stomach, and the adult male's erect penis is near the girl's genital area, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 5
(Receipt of Child Pornography)

On or about August 10, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce and that had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit, a computer video file titled "Kingpass - New Nablot 14.avi," which is approximately 25 minutes long and is a compilation of various videos depicting the sexual penetration of children, children engaging in masturbation, and the lascivious exhibition of children's genitals and pubic areas, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 6
(Receipt of Child Pornography)

On or about July 26, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce and that had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit, a computer video file titled "Tc030.avi" which is approximately 7 minutes long and depicts two prepubescent boys who remove their clothing and masturbate, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 7
(Possession of Child Pornography)

On or about August 12, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly possess one or more matters which contained visual depictions that had been shipped and transported using a means and facility of interstate commerce, including by computer, and had been mailed, shipped and transported in and affecting interstate commerce, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer video and image files:

a) pictures from ranchi torpedo dloaded in 2009 - pedo kdv kidzilla pthc toddlers 0yo 1yo 2yo 3yo 4yo 5yo 6yo 9yo tara babyj (174).jpg, which depicts a prepubescent girl performing oral sex on an adult male;

b) pictures from ranchi torpedo dloaded in 2009 - pedo kdv kidzilla pthc toddlers 0yo 1yo 2yo 3yo 4yo 5yo 6yo 9yo tara babyj (144)(1)(1).jpg, which depicts a prepubescent girl performing oral sex on an adult male; and

c) ! New ! (Pthc) 2007 8Yo Girl Jenny Sucks Dog Dick.mpg, which depicts a naked prepubescent girl on her hands and knees performing oral sex on a dog;

all in violation of Title 18, United State Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

Counts 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

JESSE DUANE JACOBS,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to one Acer Laptop ES-521 with serial number NXMLFAA0124350F03B3400; one E-Machine desktop computer with serial number PTNBG02002016138422701; one 256 MB SANDISK SD Card, no serial number; and one PNY USB 3.0 32GB Thumb Drive, no serial number.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON